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Q. Okay. Let's take a look now, if we could, sir, at Deposition Exhibit No. 1 for identification for a moment.

MR. WYMAN: And, Mr. Honik, if you could perhaps help me and move the board so that we have Exhibit No. 1, which is RAY 001098, in front of the witness on the board.

MR. HONIK: You mean there is something behind here?

MR. WYMAN: Yes, there is. There are two more boards there.

Thank you.

THE VIDEOGRAPHER: Could you move the easel over?

MR. WYMAN: If you could turn that over there. That's good.

THE VIDEOGRAPHER: Do you want to move it this way a little bit, please?

MR. HONIK: Sure. I expect a credit on this.

MR. WYMAN: Thank you, Mr. Honik.

MR. HONIK: You're welcome.

Q. (BY MR. WYMAN) Now, would you confirm to me,

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1 tubes"; is that correct?

2 A. Tubes, yes.

3 Q. Were there other places in the first floor of
4 that complex where you also worked?

5 A. (Indicating.)

6 Q. You're pointing to an area in the --

7 A. This area here, Receiving/Stores.

8 Q. And that area is where you've just pointed

9 the pointer to on the board that's now beside you?

10 A. Yes.

11 Q. Okay. And that's in the upper right quadrant
12 of the board fairly near toward the center of
13 Exhibit No. 1; is that correct?

14 A. Yes.

15 Q. Okay. Any other areas in which you worked?

16 A. (Indicating.)

17 Q. You're now pointing -- you were just pointing
18 to another area on it --

19 A. Furnaces and Machine Shop.

20 Q. Okay. And the furnaces and the machine shop,
21 do you associate them with being located in
22 what was depicted as Building No. 41 of this
23 complex?

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sir, that the board that's now to your right is a -- is a copy of what has been marked as Exhibit No. 1 in this deposition and that both of these documents have the production number RAY 001098?

A. Yes.

Q. Okay. Do you recognize Exhibit 1 as depicting the first floor of the Waltham facility of Raytheon during the time period of your employment?

A. Yes.

Q. And were there one or more places that were on the first floor of that building complex in which you worked during your employment at Raytheon?

A. Yes.

Q. Would you point out those places where you worked, sir?

A. (Indicating.)

Q. You're now pointing out portions of the first floor of the Mar Building --

A. Yes.

Q. -- including the area that says "linear beam

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1 A. I don't recall the number.

2 Q. Okay. Did you refer to these other areas
3 where the furnaces and the machine shops were
4 located by a building name?

5 A. No.

6 Q. Okay. Any other places on the first floor
7 where you worked that you recall?

8 A. No, I don't believe so.

9 Q. Okay. Would you now take a look at what has
10 been marked as Deposition Exhibit No. 2 for
11 identification, and that is the document that
12 has been marked as RAY 001100; is that correct?

13 A. Yes.

14 Q. Okay. Did you work in any portion of the
15 facility that's depicted on that chart? And
16 the board is not up there right now. If
17 you'd just --

18 A. Yes. R. Fisher.

19 Q. Okay.

20 MR. WYMAN: Thank you, Mr. Honik.

21 Q. And would you point to the R. Fisher area.

22 A. (Indicating.)

23 Q. That's in the left-hand side of the chart, is

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You mentioned at the outset of the deposition that you had some kind of a malady. What was that?

A. Parkinson's Disease and cancer.

Q. Does that Parkinson's -- how long have you had Parkinson's?

A. Six years.

Q. Does that affect your memory at all?

A. My wife may argue. Not to my knowledge, no.

Q. You worked at Raytheon from 1982 to 1989; is that right?

A. Correct.

Q. And during that period did you know Suzanne Genereux?

A. Yes.

Q. How did you know her?

A. The operations -- I knew practically all the people that worked on the tubes that I was responsible for just in a friendly --

Q. And which of the tubes that you were responsible for did she work on?

A. The sandblast operators worked on material for a variety of tubes. There was no set --

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Q. And you don't know whether the Backward Wave Oscillators contained any beryllium parts -- beryllium oxide parts?

A. No, they did not.

Q. You know that they did not contain them?

A. To my knowledge they did not.

Q. Did assemblers who worked in the BWO Department do any sandblasting on the ceramics of the BWO's?

A. Well, people like Sue Genereux did, yes.

Q. And when they did that, they would have been sandblasting aluminum oxide; is that right?

A. Aluminum oxide, or -- there is, you know, other types of ceramics that we utilized there. I don't know the composition of all of them, but --

Q. Whatever they were, they weren't beryllium oxide?

A. That's right.

Q. Now, you talked quite a bit about the vacuum windows and the Klystron amplifiers, and those were made out of beryllium oxide; correct?

A. Yes.

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no given tube that they were responsible for.

Q. Well, she was not just a sandblast operator. She was also -- she also did assembly operation?

A. I believe so. Not from my operation of it.

Q. Do you know what she did assemble?

A. No. I think it was -- a crossed-field device, I thought, but I'm not sure what --

Q. She has told us that she worked in the BWO Department. Is that something you've heard of, BWO Department?

A. I was responsible for it during the year 1987, '88.

Q. And did that department produce Backward Wave Oscillators?

A. That's correct.

Q. What is a Backward Wave Oscillator?

A. When a radar system on an aircraft is illuminated by radar, it sends back an erroneous signal actually on top of that radar beam that goes back to the detector and gives it false location of the aircraft. So if a missile is fired, it will go to that -- somewhere else.

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Q. You said you were responsible, as the senior engineer, for the incoming material all the way to the outgoing end product?

A. All technical problems, yes.

Q. Okay. Well, let me ask you about the incoming material. When these -- first of all, these vacuum windows for the Klystron amplifiers were purchased by Raytheon from an outside vendor; correct?

A. Yes.

Q. And who was the outside vendor?

A. It could have been Brush Wellman, it could have been Kyocera, and I think for a brief period of time we had Coors, but I'm not certain of that.

Q. Do you know for a fact whether any of these vacuum windows with the Klystron amplifiers were ever purchased from Brush Wellman?

A. I can't say that definitively, no.

Q. When the vacuum windows came to Raytheon from the manufacturer -- well, did you ever see them when they got to Raytheon?

A. Only if there was a problem.

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it, at the end of the building there?

A. Yes.

Q. And do you recognize this as the basement area of that building?

A. Yes.

Q. Any other portion of the basement area?

THE VIDEOGRAPHER: You're right in the way. Excuse me. Your head is right in the way.

MR. WYMAN: Mr. Honik. Sorry.

A. No.

Q. (BY MR. WYMAN) Okay. Let me refer you, if I may, sir, back to your declaration which has been marked as Exhibit 4 for identification.

MR. HONIK: John, do you know what the date of these documents are? They're obscured on my copies and I can't see them on the exhibit.

MR. WYMAN: My best copy that I have, it was also obscured so that I couldn't read it either. We may have to get a better copy of these documents.

Mr. Balint, do you have Exhibit No. 4 in front of

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you right now?

Yes.

Okay. In Paragraph No. 4, sir, there are references to a number of projects that are set forth there --

Mm-hmm.

-- the first of which is the Sea Sparrow missiles, and it makes reference to overseeing production of Klystron amplifier tubes. Do you see that?

Yes.

And during what period of time did you work as a senior engineer in connection with that project?

1982 to 1985.

Would you tell me generally what type of a product was being produced in connection with that project.

Klystron amplifiers.

And could you give a simple description of what a Klystron amplifier tube is?

It's to take a signal from a Klystron oscillator and amplify it.

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1 Q. Okay. And what role did you play in connection

2 with that project?

3 A. As a senior engineer, I oversaw the project

4 from incoming material to outgoing end product.

5 Q. Okay. Where did the activities of that

6 particular production take place within the

7 facility, sir?

8 A. Almost the entire plant.

9 Q. Okay. So that there were multiple steps

10 involved and they were in many different places

11 in the plant?

12 A. Yes.

13 Q. Did that project involve any work on any

14 ceramic material that contained beryllium?

15 A. Yes.

16 Q. Could you identify what component or components

17 in that product contained beryllium?

18 A. Vacuum windows, ceramic.

19 Q. And would you describe what vacuum windows were?

20 A. Ceramic windows, what the RF energy was passed

21 through.

22 Q. And in what form did the project that you

23 were working on in connection with the Sea

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1 Sparrow missile Klystron amplifier tubes --

2 in what form did the beryllium-containing

3 materials first enter the project that you

4 were working on?

5 A. They were ceramic windows.

6 Q. Were they already formed when they came to

7 the portion of the project that you were

8 involved in?

9 A. Yes.

10 Q. In connection with the production you were

11 involved in, was there anything that was done

12 to these ceramic -- these vacuum windows that

13 contain beryllium material?

14 A. Repeat that question.

15 Q. Was there any process or procedure that was

16 performed on the vacuum windows during the

17 production of those vacuum windows -- during

18 the production of those Klystron amplifier

19 tubes with the Sea Sparrow missile in the

20 processes that you were involved in?

21 A. Yes.

22 Q. Would you describe, please, generally what

23 process or processes were performed on the

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- A. I think I -- yes, I said that --
Q. What changes did you recommend in Paragraph 4?
A. I changed -- there was no change in 4. 5 was where the changes were made, I believe.
Q. Okay. Did you -- have you had any discussions with Suzanne Genereux about the manufacturers of any of the beryllium-based products that you worked on?
A. No, no.

MR. AHERN: That's all I have. Thank you.

THE REPORTER: Is it just a couple of questions?

MS. LINDEMANN: It actually is very short, very short. I think everyone has covered almost everything I could possibly think of and a lot more.

EXAMINATION

BY MS. LINDEMANN:

- Q. I just wanted to clear up a couple things. My name is Frances Lindemann and I represent Hardric Industries.

The terms, "beryllic" --

- 1 at Raytheon that included beryllium oxide?
2 A. Restate that, please.
3 Q. Okay. You had talked about these -- the vacuum
4 windows --
5 A. Yes.
6 Q. -- that had beryllium oxide. Do any other
7 products or components come to mind that also
8 included beryllium oxide?
9 A. No.
10 Q. Okay. The vacuum windows, these were used
11 actually as part of production in creating
12 the ultimate assembly; is that correct?
13 A. Yes.
14 Q. Roughly speaking, how many vacuum windows
15 might be used in a week's time?
16 A. One time we shipped 100 tubes. That was the
17 most ever shipped. So you're talking 200
18 windows. Generally we're talking in terms of
19 20 to 30 tubes, which is --
20 Q. In a week.
21 A. Oh, in a week. I'm sorry.
22 Q. Were you -- or what time frame were you talking?
23 A. A month.

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- A. You represent who?
Q. I represent -- you haven't even heard of them -- Hardric Industries.
A. No, I haven't heard of them.
Q. The terms, "beryllium products" and "beryllium" and "beryllium oxide", throughout the deposition were used interchangeably. To your knowledge are they the same thing?
A. Beryllia and beryllium oxide are the same thing.
Q. Beryllium metal would be something different to your knowledge?
A. Yes, yes.
Q. In referring to the components that were used in your projects, were you referring to beryllium oxide?
A. Yes.
Q. Are you aware of any products that were being created while you were working at Raytheon that used beryllium -- hard beryllium metal?
A. No, not to my knowledge.
Q. You've talked about vacuum windows that include beryllium oxide. Are you aware of any other components that were being used at that time

- 1 Q. Okay. So in a month it would be 20 to 30
2 generally, but on one occasion you did 200?
3 A. Yes.
4 Q. Okay. And I just wanted to confirm again,
5 you've never heard of Hardric Industries; is
6 that correct?
7 A. That's correct.
8 MS. LINDEMANN: Thank you.
9 THE VIDEOGRAPHER: Okay. The time
10 is 1:36. We're now off record.
11 (Luncheon recess was taken at 1:36 p.m.)
12 (Resumed at 2:42 p.m.)
13 THE VIDEOGRAPHER: The time is 2:39.
14 We're now back on record.
15 EXAMINATION
16 BY MR. WYMAN:
17 Q. Mr. Balint, I have a few additional questions.
18 Mr. Ahern asked you about whether
19 you had observed the receiving function where
20 beryllium-containing ceramics were received
21 by Raytheon, and I believe your answer was that
22 you had not?
23 A. Well, I'm not there when the packages are